Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
The Use of N11 Codes and Other	)	CC Docket No. 92-105
Abbreviated Dialing Arrangements	)	

REPLY COMMENTS OF CALIFORNIA DEPARTMENT OF TRANSPORTATION

The California Department of Transportation (Department) hereby submits its Reply Comments to the Comments filed to refresh the record regarding reconsideration of the Commission's designation of the 211 and 511 abbreviated dialing codes.

California has one-eighth of America's population, distributed among half-dozen distinct major metropolitan regions with different geographies, climates, and cultures. What they all have in common is traffic congestion and the resultant air quality health problems. Eighty-five percent of California's population lives within 35 miles of international ports of entry, adding importance to easy-to-access traveler information during potential homeland security disaster response. Deploying Intelligent Transportation Systems (ITS) and Advanced Traveler Information Systems with 511 telephone access (ATIS/511) requires a California take a regional approach.

Starting with the 7-million population San Francisco Bay Area's $39 million ATIS/511 deployment in 2002, 511 has been enthusiastically received by millions of people and has 90% user approval ratings – among the highest of any public service for any purpose.

The Sacramento and rural Northern California 511 debuted this September, covering approximately 3 million population. In its second month of service it received over 12,000 calls, without any advertising or marketing. This compares to the 700 calls per month for the previous 10-digit traveler information telephone number. Many of the calls are from Bay Area residents searching for traffic and travel advisories along the critical transcontinental Interstate 80 corridor, who dialed 511 because they knew that number, but not the old 10-digit number.

Next year will see the San Diego ATIS/511 come on line in that 4 million population region.. The San Diego region is estimated to have invested $10 million in ITS data collection and information sharing among state and local road agencies, and transit and rail service providers. The ATIS/511 may cost an additional $4 to 6 million, and be a critical support to the tourism and international trucking industries in San Diego.

We are in the planning stages in Central California and with the five-county metropolitan Southern California region. The 17 million population Southern California region is a single commute shed spreading through Los Angeles, Ventura, San Bernardino,

Riverside and Orange counties. Executive level discussions are underway regarding the scope, timing, and phasing for a joint powers ATIS/511 in one of America's premiere urban regions. The five counties, along with the State of California and the US Department of Transportation, has already invested over $37 million in ITS data collection and inter-agency information sharing. ATIS/511 is critical for the traveling public to benefit from these tax-dollar investments.

Our experience with ATIS/511 tells us to expect distinct spikes of three to twelve times normal (3x to 12x) for major events, such as snow storms over the Sierra Nevada, floods along key rivers, wild fires, or transit strikes. And routine jumps in use for holidays, September, June: whenever consumers need information for their changing travel needs. As shown in the Sacramento/Northern California example above, travelers have come to expect 511 to work wherever they go, as a quick and easy number to get the information they need for a safe and reliable trip.

We have not had any conflict for assigning the 511 to the proper regional transportation agencies. The California Public Utilities Commission has recognized the Department as the State's coordinating agency. The implementing regional transportation agencies and the Department have had the most positive relationships with both wire line and wireless telephone carriers.

California has not had problems with wireless carriers routing 511 calls. First, our regions are large enough to permit switch-level call routing at little or no effort by the carriers. Second, we share inter-regional information between regional ITS and ATIS/511 systems allowing border area information to be provided by neighboring ATIS/511 systems. Third, we allow call transfers to neighboring ATIS/511. For example, a caller to the Sacramento Regional ATIS/511 has options to transfer to the Bay Area 511, Oregon 511, or Nevada 511. In this way, should a specific wireless carrier connect someone in a border situation to Sacramento when the caller wanted the Bay Area, the caller can transfer to the Bay Area 511 and still get the information they need. Contrast this quality of service to pre-511, when a caller would have to figure out the name of the transit service serving the local area, find a telephone directory, and then find the customer service telephone number. And perhaps pay a long distance calling fee.

With regards that ATIS/511 might somehow compete against commercial traveler services, in the past ten years the Department has supported several start-ups only to see them fail. One 1997 firm sought to include advertising with the phone message; it could not sustain a customer base, then lost advertisers, and failed in a few months. Another firm calculated least-time routing based on real-time traffic conditions, failing to attract nationwide capitalization and even unable to attract repeat users on complimentary accounts when the service was offered for free from 1997 to 1999. A third firm uses customer internet registration to define trips, then telephone calls for traffic conditions and least-time routing directions. This firm cannot sell its service for even $4.95/month to New York and Los Angeles commuters. The California Department of Transportation actively supported each of these firms, giving them real-time traffic data and in some cases experimental funding, to ascertain if high quality traveler services were

commercially feasible. Someday perhaps there will be a market for high quality, personalized trip routing services that go beyond the basic traffic and transit information provided via ATIS/511. But these services do not exist today, are unlikely to be commercially feasible in the foreseeable future, and their markets may support incremental 'value-added' features where the basic ATIS/511 service costs are covered by the transportation taxpayer.

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